



March 15, 2018

8609.03

County of Humboldt Public Works Department – Land Use Division
3015 H Street
Eureka, California 95501

Attention: Bob Bronkall, Deputy Director

Subject: Request for Humboldt County Airport Land Use Commission (ALUC) Consistency
Determination Hearing
Southern Humboldt Community Healthcare District (SHCHD)
SHCHD Facility Expansion Project
286 Sprowl Creek Road, Garberville, Humboldt County, California
Assessor's Parcel Number (APN) 032-091-014

Dear Mr. Bronkall:

LACO Associates (LACO) is writing on behalf of our client, the Southern Humboldt Community Healthcare District (SHCHD), to request a proposed project be scheduled for a Humboldt County Airport Land Use Commission (ALUC) Consistency Determination Hearing. The project, as currently proposed, involves the construction of new hospital and clinic buildings at the property identified as Assessor's Parcel Number (APN) 032-091-014, located at 286 Sprowl Creek Road in the unincorporated community of Garberville in Humboldt County, California (site).

Although the site is partially located within the Airport Land Use Compatibility Zone C (see Figure 1), which prohibits several uses from being located within this zone, including schools, hospitals, nursing homes, or hazards to flight, there is strong evidence to support that the proposed project would be consistent with the Airport Land Use Compatibility Plan (ALUCP), dated March 1993, and former uses at the site, and would be a great benefit to the surrounding community.

Proposed Project

The SHCHD is proposing the construction of two new hospital and clinic buildings on the southern portion of the site. In addition, an existing structure (which currently houses the Redwood Playhouse, a community theater) located within the northern portion of the site would be renovated and associated improvements, including, but not limited to, parking, landscaping, and a dedicated ambulance driveway with access control off Sprowl Creek Road along the property's western boundary would be developed. Proposed improvements to the existing structure include remodeling a portion of the interior of the structure to include a new full kitchen, administration space, and community education space, which is proposed for continued use by the College of the Redwoods for educational purposes. Specific sizes of each of the proposed uses are not provided on the preliminary plans.

Conceptual project plans, dated February 16, 2017, indicate that the new hospital structure, proposed to be constructed south of the existing structure located on-site, would have a building footprint of approximately 15,500 square feet. The proposed hospital building would total approximately 32,600 square feet in size (including 2,900 square feet of warm shell space) and would

be comprised of two stories. The proposed clinic building would be constructed south of and adjacent to the new hospital building and would total approximately 3,900 square feet in size and would be one story in height. The preliminary plans note that the clinic building may be expanded in the future. Under the proposed project, the site would continue to be accessed from Sprowl Creek Road. In addition to the dedicated ambulance entry proposed along the western portion of the site, the site would continue to utilize the two existing ingress and egress points located along the site's northern boundary, which include one dedicated site entrance and one dedicated site exit. A total of 104 standard parking spaces, 6 accessible parking spaces, and 2 ambulance unloading parking spaces would be provided on-site. A preliminary site plan illustrating a plausible site layout is enclosed for your reference.

The proposed project would replace the existing hospital and clinic facilities located within the eastern portion of Garberville at 733 Cedar Street, which would continue to provide skilled nursing and other needed services within the community. The new hospital building would be larger in size, and would contain 15 patient beds, 6 more than the existing hospital facility. Therefore, with the development of the proposed project, more persons from Garberville and the surrounding communities could be served.

Site Characteristics

The site is approximately 3.1 acres in size and is located within an approximately 12.5-acre developed portion of Garberville, located west of Highway 101. Additionally, the site is located approximately 250 feet west of Garberville proper, which houses all sorts of commercial uses, west of Redwood Drive. The site is relatively flat in nature, with elevations ranging from approximately 530 feet above mean sea level (amsl) along the site's northern boundary to approximately 550 feet amsl along the site's southern boundary. The site is located approximately 740 feet southeast of the South Fork of the Eel River and is located west of Highway 101, adjacent to the Highway 101 southbound onramp.

The project site contains existing development, primarily within the northern half of the site. As noted above, aerial imagery indicates that the existing structure currently located on the site is approximately 10,100 square feet in size and currently houses the Redwood Playhouse, a community theater. Additional features on the site include two existing driveways (one site entrance and one site exit), internal roadway and sidewalks, parking, and landscaping located behind the existing building. The southern half of the site is undeveloped, consisting of a grassy field with numerous trees in the southernmost portion of the site. Various trees are also located along the site's eastern boundary.

Airport Land Use Compatibility Zone C

As noted in the Airport Land Use Compatibility Plan (ALUCP), dated March 1993, the purpose of the ALUCP is to set forth the criteria and policies which the Humboldt County Airport Land Use Commission (ALUC) will use in assessing the compatibility between the public use airports in Humboldt County, including the Garberville Airport, and proposed land use development the areas surrounding them.

Within the vicinity of the Garberville Airport, the ALUCP has established Airport Land Use Compatibility Zones for the area surrounding the airport. Specifically, the site, which is located approximately 2.2 miles from the Garberville Airport, is located within the Airport Land Use Compatibility Zone C. It is important to note that Airport Land Use Compatibility Zone C is the Airport Land Use Compatibility

Zone located the furthest from the Garberville Airport and only the western portion of the site is located within the Airport Land Use Compatibility Zone (see Figure 1).

As provided in Table 2A (Compatibility Criteria) of the ALUCP, there are five specific airport land use compatibility zones and the site is partially located within one of the least intrusive zones:

Table 2A
Compatibility Criteria
 Humboldt County Airport Land Use Compatibility Plan

Zone	Location	Impact Elements	Maximum Densities		Required Open Land ³
			Residential (du/ac) ¹	Other Uses (people/ac) ²	
A	Runway Protection Zone or within Building Restriction Line	<ul style="list-style-type: none"> High risk High noise levels 	0	10	All Remaining
B1	Approach/Departure Zone and Adjacent to Runway	<ul style="list-style-type: none"> Substantial risk – aircraft commonly below 400 ft. AGL or within 1,000 ft. of runway Substantial noise 	0.1	60	30%
B2	Extended Approach/Departure Zone	<ul style="list-style-type: none"> Significant risk – aircraft commonly below 800 ft. AGL Significant noise 	0.5	60	30%
C	Common Traffic Pattern	<ul style="list-style-type: none"> Limited risk – aircraft at or below 1,000 ft. AGL Frequent noise intrusion 	4	150	15%
D	Other Airport Environs	<ul style="list-style-type: none"> Negligible risk Potential for annoyance from overflights 	No Limit	No Limit	No Requirement

Zone	Additional Criteria		Examples	
	Prohibited Uses	Other Development Conditions	Normally Acceptable Uses ⁴	Uses Not Normally Acceptable ⁵
A	<ul style="list-style-type: none"> All structures except ones with location set by aeronautical function Assemblages of people Objects exceeding FAR Part 77 height limits Hazards to flight⁶ 	<ul style="list-style-type: none"> Dedication of aviation easement 	<ul style="list-style-type: none"> Aircraft tiedown apron Pastures, field crops, vineyards Automobile parking 	<ul style="list-style-type: none"> Heavy poles, signs, large trees, etc.
B1 and B2	<ul style="list-style-type: none"> Schools, day care centers, libraries Hospitals, nursing homes Highly noise-sensitive uses Storage of highly flammable materials Hazards to flight⁶ 	<ul style="list-style-type: none"> Locate structures maximum distance from extended runway centerline Minimum NLR⁷ of 25 dBA in residential and office buildings Dedication of aviation easement 	<ul style="list-style-type: none"> Uses in Zone A Any agricultural use except ones attracting bird flocks Warehousing, truck terminals Single-story offices 	<ul style="list-style-type: none"> Residential subdivisions Intensive retail uses Intensive manufacturing or food processing uses Multiple story offices Hotels and motels
C	<ul style="list-style-type: none"> Schools Hospitals, nursing homes Hazards to flight⁶ 	<ul style="list-style-type: none"> Dedication of overflight easement for residential uses 	<ul style="list-style-type: none"> Uses in Zone B Parks, playgrounds Low-intensity retail, offices, etc. Low-intensity manufacturing, food processing Two-story motels 	<ul style="list-style-type: none"> Large shopping malls Theaters, auditoriums Large sports stadiums Hi-rise office buildings
D	<ul style="list-style-type: none"> Hazards to flight⁶ 	<ul style="list-style-type: none"> Deed notice required for residential development 	<ul style="list-style-type: none"> All except ones hazardous to flight 	

NOTES

- 1 Residential development should not contain more than the indicated number of dwelling units per gross acre. Clustering of units is encouraged as a means of meeting the Required Open Land requirements.
- 2 The land use should not attract more than the indicated number of people per acre at any time. This figure should include all individuals who may be on the property (e.g., employees, customers/visitors, etc.). These densities are intended as general planning guidelines to aid in determining the acceptability of proposed land uses.
- 3 See Policy 3.2.5.
- 4 These uses typically can be designed to meet the density requirements and other development conditions listed.
- 5 These uses typically do not meet the density and other development conditions listed. They should be allowed only if a major community objective is served by their location in this zone and no feasible alternative location exists.
- 6 See Policy 3.3.5.
- 7 NLR = Noise Level Reduction; i.e., the attenuation of sound level from outside to inside provided by the structure.

BASIS FOR COMPATIBILITY ZONE BOUNDARIES

The following general guidelines are used in establishing the Compatibility Zone boundaries. Modifications to the boundaries may be made to reflect specific local conditions such as existing roads, property lines, and land uses.

- A The boundary of this zone for each airport is defined by the runway protection zones (formerly called runway clear zones) and the airfield building restriction lines.

Runway protection zone dimensions and locations are set in accordance with Federal Aviation Administration standards for the proposed future runway location, length, width, and approach type as indicated on an approved Airport Layout Plan. If no such plan exists, the existing runway location, length, width, and approach type are used.

The building restriction line location indicated on an approved Airport Layout Plan is used where such plans exist. For airports not having an approved Airport Layout Plan, the zone boundary is set at the following distance laterally from the runway centerline:

Visual runway for small airplanes	370 feet
Visual runway for large airplanes	500 feet
Nonprecision instrument runway for large airplanes	500 feet
Precision instrument runway	750 feet

These distances allow structures up to approximately 35 feet height to remain below the airspace surfaces defined by Federal Aviation Regulations Part 77.
- B1 The outer boundary of the Approach/Departure Zone is defined as the area where aircraft are commonly below 400 feet above ground level (AGL). For visual runways, this location encompasses the base leg of the traffic pattern as commonly flown. For instrument runways, the altitudes established by approach procedures are used. Zone B1 also includes areas within 1,000 feet laterally from the runway centerline.
- B2 The Extended Approach/Departure Zone includes areas where aircraft are commonly below 800 feet AGL on straight-in approach or straight-out departure. It applies to runways with more than 500 operations per year by large aircraft (over 12,500 pounds maximum gross takeoff weight) and/or runway ends with more than 10,000 total annual takeoffs.
- C The outer boundary of the Common Traffic Pattern Zone is defined as the area where aircraft are commonly below 1,000 feet AGL (i.e., the traffic pattern and pattern entry points). This area is considered to extend 5,000 feet laterally from the runway centerline and from 5,000 to 10,000 feet longitudinally from the end of the runway primary surface. The length depends upon the runway classification (visual versus instrument) and the type and volume of aircraft accommodated. For runways having an established traffic solely on one side, the shape of the zone is modified accordingly.
- D The outer boundary of the Other Airport Environs Zone conforms with the adopted Planning Area for each airport.

Historic Use of the Site

The site has historically been utilized as a school for approximately 80 years, since the late 1930s. As detailed in *Historical Resources Study of the Property at 286 Sprowl Creek Road (APN 032-091-014), Garberville, Humboldt County, California* (Historical Resources Study), prepared by Tom Origer & Associates, dated December 19, 2016, the structure currently located at the site was constructed in 1939 to serve as the new Garberville Elementary School. When originally constructed, the building only consisted of four rooms and was built across the street from the original Garberville Elementary School.



Garberville Elementary School (no date)

Source: Humboldt County Office of Education. *Historic Humboldt County School Photos*. Available at: <http://www.humboldt.k12.ca.us/historic-photos.php>.

The site was purchased in 2010 by the College of the Redwoods and operated as the Garberville Instructional Site for College of the Redwoods, which is now pending sale of the site to the SHCHD.

It is important to note that schools are also designated as a "prohibited use" within the Airport Land Use Compatibility Zone C; however, as noted above, the site has been utilized as a school since the late 1930s. Furthermore, theaters and auditoriums are also designated as "uses not normally acceptable" within the Airport Land Use Compatibility Zone C; however, the existing building has been operated as theater and performance arts venue since the 1970s and as the Redwood Playhouse since 2013.

ALUCP Consistency Reasoning

Only the western portion of the site is located within the Airport Land Use Compatibility Zone C (see Figure 1), which is also one of the least intrusive zones. The Airport Land Use Compatibility Zone C prohibits several uses from being located within this zone, including schools, hospitals, nursing homes, or hazards to flight. However, the site has historically been used as a school since the late 1930s, which is denoted as a "prohibited use" within the Airport Land Use Compatibility Zone C, similar to the use (hospital and clinic) proposed under the project. It is important to note that sites within the Airport Land Use Compatibility Zone C, such as the subject site, are subject to a limited safety risk.

Infill

Pursuant to Policy 2.1.5 of the ALUCP, "where substantial incompatible development already exists additional infill development of similar land uses may be allowed to occur even if such land uses are to be prohibited elsewhere in the zone", and would be subject to the following criteria:

1. The ALUC has determined that "substantial development" already exists; and
2. The project site is bounded by uses similar to those proposed.

As previously discussed, the site is previously developed and the proposed development at the site would be developed in accordance with the development standards for land uses located within the Airport Land Use Compatibility Zone C, as denoted in Table 2A above, as well as the applicable development standards in the County of Humboldt General Plan and Zoning Regulations. Although the project site is located within an approximately 12.5-acre substantially developed portion of Garberville primarily containing residential development, located west of Highway 101, the site is only located approximately 250 feet west of Garberville proper, which contains a variety of commercial, and civic uses, including but not limited to restaurants, motels, and health care services, including the existing clinic and hospital facilities, which serve Garberville and the surrounding local communities, located east of Highway 101.

Development Standards

Proposed development at the site would be consistent with the maximum densities and development criteria provided in Table 2A of the ALUCP, above. Pursuant to Table 2A, "other uses" which are not residential, such as the proposed project, would be limited to a maximum density of 150 people per acre. Since the site is approximately 3.1 acres in size, the proposed hospital and clinic buildings, as well as the existing structure to remain on-site, would be limited to a maximum occupancy of 465 persons based on Table 2A. The SHCHD estimates that the new facilities would serve up to an average of 50 patients per day, with approximately 50 maximum employees per day. Occupancy information provided by the hall manager of the Redwood Playhouse indicated that the facility could accommodate up to 130 persons at any given time. It is estimated that patients to the facilities would be accommodated by someone or would even have visitors when staying in the hospital; however, unless each patient had over 5 visitors visiting at the same time, the maximum density allowable at the site would not be exceeded. It is estimated that, on average, use of the existing and proposed facilities would result in less than 250 persons on-site at any given time, and the maximum allowable density of 465 persons at the site would not be exceeded.

Pursuant to Table 2A, a minimum amount of open space is required within the Airport Land Use Compatibility Zone C. However, even with development of the proposed project at the site, the minimum requirement of 15 percent of open land within the Airport Compatibility Zone C would still be achieved, as land to the west and south of the site is minimally developed and contains large open areas. As noted in Policy 3.2.5 of the ALUCP, a certain amount of open land in each Airport Land Use Compatibility Zone is required, in order to reduce potential impacts associated with emergency aircraft landings. It is important to note that open land requirements for each compatibility zone are to be applied with respect to the entire zone, as individual parcels may be too small to accommodate the minimum size open area requirement. To qualify as open land, areas must be: 1) free of structures and other major obstacles such as walls, large trees, and overhead wires; and 2) have minimum dimensions of at least 75 feet by 300 feet. Policy 3.2.5 also states that roads and parking lots are acceptable as open land areas, provided they meet the specified criteria.

It is noted in Table 2A that aircraft within the Airport Land Use Compatibility Zone C are frequently at or below 1,000 feet above ground level. Preliminary conceptual plans provided by SCHCD indicate the clinic building would consist of one story, with the new hospital structure comprising two stories. Although specific building heights are not provided on the conceptual plans, buildings heights would be designed to be less than 50 feet in height, ensuring at least 950 feet below the lowest flying aircraft and the peak of the two-story roof of the proposed hospital building. Furthermore, Table 2A notes that two story motels are "normally acceptable uses" within Airport Land Use Compatibility Zone C. Although the proposed use differs from a motel, the project would be limited to a maximum of two stories.

Sensitive Receptors and Noise Attenuation

Sensitive receptors, as defined by the North Coast Unified Air Quality Management District (NCUAQMD) (2014), include, but are not limited to, preschools and daycare centers, K-12 schools, nursing homes, hospitals, Class I Areas (any area having air quality values requiring special protection and which has been designated Class I by a federal, State or local authority), and other locations where there are concentrations of sensitive populations. Uses within the Airport Land Use Compatibility Zone C are subject to frequent noise intrusion, as specified in Table 2A. Although the proposed project proposes construction of a sensitive receptor within Airport Land Use Compatibility Zone C, the project would be designed in such a way to reduce noise intrusion to the greatest extent feasible, through the use of such components, including, but not limited to, soundproofing insulation and noise-reducing windows, ceiling panels, and curtains.

Community Benefit

Although the proposed project is listed as a "prohibited use" in Table 2A, the construction of new hospital and clinic buildings at the subject site would provide a great benefit to the community and could be developed in such a way to ensure safety and compatibility with the Garberville Airport and corresponding Airport Land Use Compatibility Zones. The hospital and clinic buildings are proposed to replace the existing buildings located within the eastern portion of Garberville at 733 Cedar Street, which would continue to provide skilled nursing and other needed services within the community. The new hospital facility would contain 15 patient beds, 6 more than the current hospital facility, thereby allowing for more persons from Garberville and the surrounding communities to be served.

In our professional opinion, we believe there is strong evidence to support that the proposed project would be consistent with the Airport Land Use Compatibility Plan (ALUCP), dated March 1993, and former uses at the site, and would be a great benefit to the community of Garberville as well as surrounding communities.

Should you have any questions or require any additional information, please do not hesitate to contact me at (707) 443-5054 or marruffom@lacoassociates.com.

Request for Airport Land Use Commission (ALUC) Consistency Determination Hearing
SHCHD Facility Expansion Project
286 Sprowl Creek Road, Garberville, Humboldt County, California
SHCHD; LACO Project No. 8609.03
March 15, 2018
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Sincerely,

LACO Associates



Megan Marruffo
Associate Planner

Southern Humboldt Community Healthcare District







Kent Scown
Chief Operating Officer

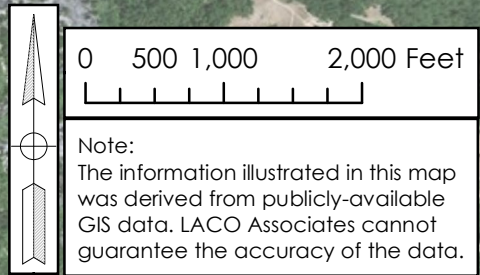
Cc: Matthew Rees, CEO, Southern Humboldt Community Healthcare District

Enclosures

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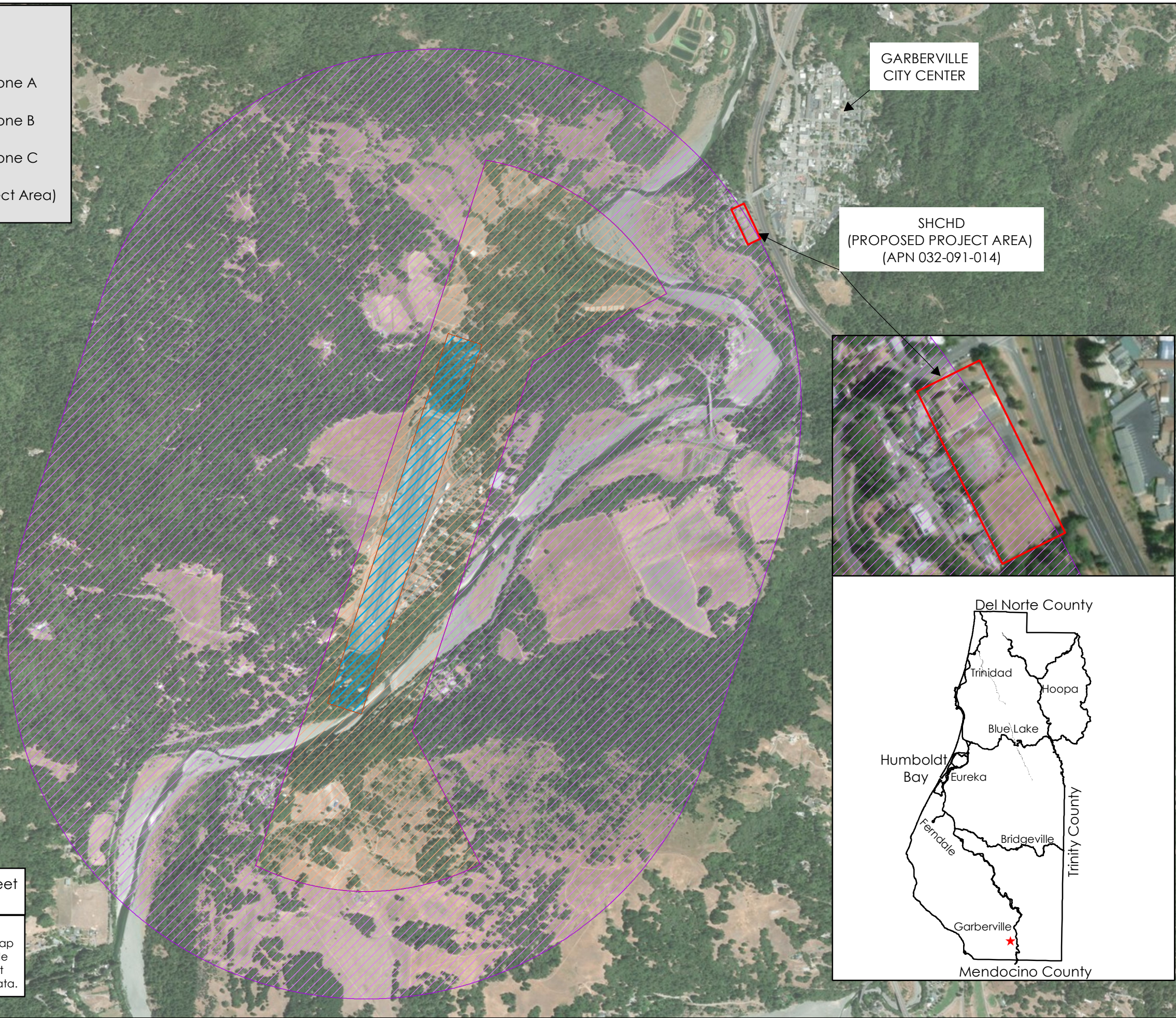
Legend

-  Airport Compatibility Zone A
-  Airport Compatibility Zone B
-  Airport Compatibility Zone C
-  SHCHD(Proposed Project Area)



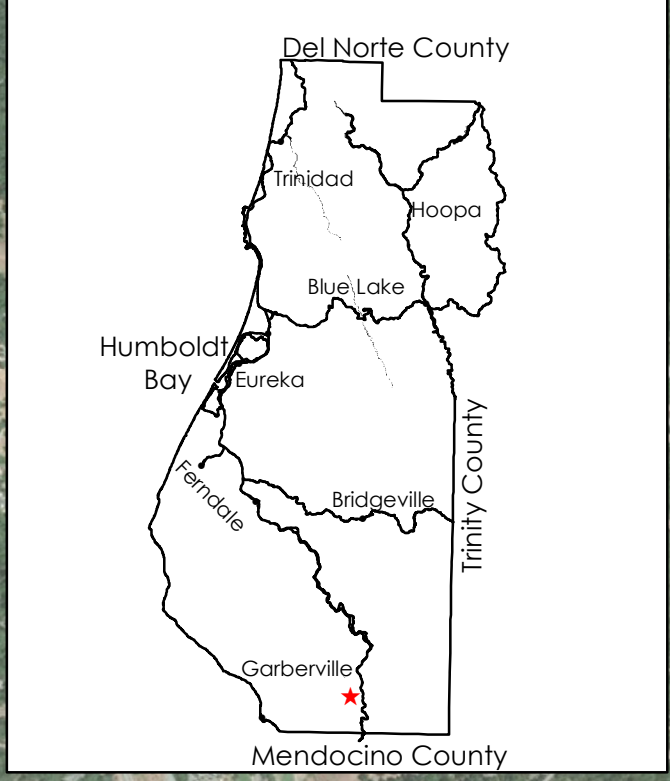
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Note:
 The information illustrated in this map was derived from publicly-available GIS data. LACO Associates cannot guarantee the accuracy of the data.



GARBERVILLE CITY CENTER

SHCHD (PROPOSED PROJECT AREA) (APN 032-091-014)



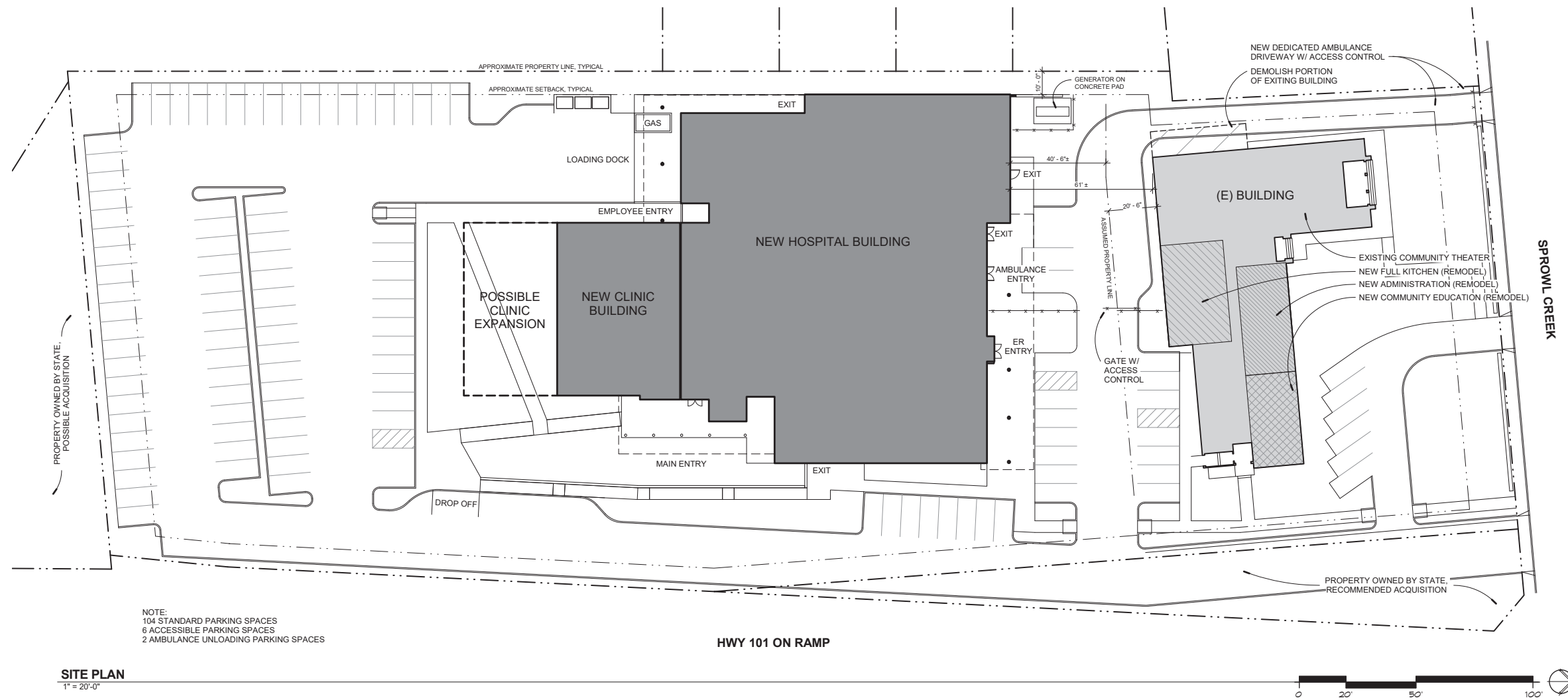
LACO
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NO.	HISTORY/REVISION	BY	CHK.	DATE

AIRPORT LAND USE COMPATIBILITY ZONE
FACILITY EXPANSION
 APN 032-091-014

SOUTHERN HUMBOLDT COMMUNITY HEALTHCARE DISTRICT
 286 SPROWL CREEK ROAD, GARBERVILLE, CALIFORNIA

DRAWN	CMB
CHECK	MMM
APPROVED	DNC
DATE	3/15/2018
JOB NO.	8609.03
FIGURE	1



2024 HOSPITAL BUILDING AND CLINIC

286 SPROWL CREEK ROAD

PLAUSIBLE SITE LAYOUT

GARBERVILLE, CALIFORNIA



FEBRUARY 16th, 2017